

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>IN RE:</b>  <b>KRISJENN RANCH, LLC, <i>et al</i></b>  <b>DEBTOR</b>	§ § § § § §	<b>CHAPTER 11</b>  <b>CASE NO. 20-50805-rbk</b>  <b>(Jointly Administered)</b>
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**DECLARATION OF PROPOSED  
ACCOUNTANT, DOUGLAS G. DEFFENBAUGH**

**THE STATE OF TEXAS     §**  
**COUNTY OF BEXAR       §**

1. "My name is Douglas G. Deffenbaugh. I am a certified public accountant, duly licensed to practice in the State of Texas. I am over the age of eighteen (18), am of sound mind, and have not been convicted of a felony or misdemeanor involving moral turpitude.

2. Douglas G. Deffenbaugh, C.P.A. maintains offices at 14350 Northbrook Drive, #200, San Antonio, Texas 78232. Douglas G. Deffenbaugh, CPA has been selected as the accountant for Krisjenn Ranch, LLC ("Debtor") subject to the approval of the Court.


3. The engagement letter attached as Exhibit "A" accurately describes the terms of my representation and the fees we will charge the Debtor for our services.

4. We are a disinterested person with regard to the Debtor in the above-captioned matter in that:

- a. We are not equity security holders or insiders;
- b. We are not and have not been, within two (2) years before the date of the filing of petition, a director, officer, or employee of the Debtor;
- c. We do not represent an interest adverse to the Debtor herein, or its estate, in the matter upon which we are to be engaged; and
- d. We did not have an outstanding balance owed by Debtor as of the date it filed its chapter 11 petition.

5. Except as set forth herein, we have no other known connections with the Debtor, its creditors, any other parties-in-interest, its respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee, and we are a 'disinterested person' within the definition of Section 101(14) of the Bankruptcy Code.

6. I declare under penalty of perjury under the laws of the State of Texas and of the United States of America that all of the foregoing statements are made to the best of my knowledge and belief and are true and correct.”



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DOUGLAS G. DEFFENBAUGH



*Douglas G. Deffenbaugh, C.P.A.*

DOUGLAS G. DEFFENBAUGH

*EXHIBIT A*

**ENGAGEMENT LETTER FOR BANKRUPTCY ACCOUNTING WORK**

August 1 2020

This letter is to outline the terms of my engagement to provide accounting services for KrisJenn Ranch, LLC and any series LLC in Case No. 20-50805 in The U.S. Bankruptcy Court for the Western District of Texas, San Antonio Division at the request of the Larry Wright. As part of my engagement I will: Prepare the Monthly Operating Report and any related bookkeeping services. Any other requested accounting services will be at the same hourly rate described herein.

It is your responsibility to provide all the information required for the preparation of complete and accurate monthly operating reports. You represent that the information you provide will be accurate and complete to the best of your knowledge. I will not audit or otherwise verify the information provided, although I may ask for clarification if the information appears to be incorrect, inconsistent, or incomplete. My work in connection with the preparation of the monthly operating report does not include any procedures designed to discover errors or other irregularities, should any exist. **You have the final responsibility for the monthly operating report and, therefore, you should carefully review them before you sign and file them.**

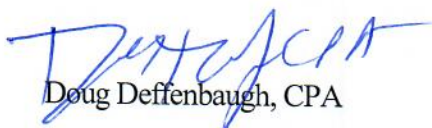
My fees for these services will be at the rate of \$200.00 per hour. The fees are due upon completion of the work and presentation of invoice after any necessary court approval. Checks should be made payable to Douglas G. Deffenbaugh, CPA. You may terminate this engagement at any time. Should you do so, however, you remain liable for all unpaid fees as discussed above. I reserve the right to withdraw from this engagement at any time for any reason. I will notify you of any decision by me to withdraw. I will take all reasonable steps to assist in the orderly transfer of your work.

If the foregoing is in accordance with your understanding, please sign the enclosed copy of this letter in the space provided and return it to me along with your tax information. If you have any questions, please do not hesitate to contact me. I appreciate your business.

Respectfully,

Accepted by: \_\_\_\_\_

Date \_\_\_\_\_ Title \_\_\_\_\_

  
Doug Deffenbaugh, CPA

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San Antonio, Texas 78232

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